

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES OF AMERICA,**

**v.**

**SEAN ANDREW DUNCAN,**

**Defendant.**

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**Case No. 1:18CR19,  
1:18CR161  
Honorable Leonie M. Brinkema  
Sentencing Hrg: July 6, 2018**

**DEFENDANT'S ADDENDUM TO POSITION ON SENTENCING FACTORS**

COMES NOW the Defendant, Sean Duncan, by and through her attorney, Elizabeth Mullin, and pursuant to 18 U.S.C. §3553(a)(1), respectfully requests this Court read the additional attached letter prior to the imposition of sentence in this case. Undersigned counsel filed the attached immediately upon receiving it and will have a copy available in Court.

Respectfully submitted,

SEAN DUNCAN

By Counsel,

Jeremy C. Kamens,  
Federal Public Defender

By:

                    /s/                      
Elizabeth A. Mullin  
Virginia Bar No. 86668

Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2018, I will electronically file the foregoing with the Clerk of court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Gordon Kromberg, Esq.  
Colleen Garcia, Esq.  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, VA 22314

Pursuant to the Electronic Case Filing Policies and Procedures, a courtesy copy of the forgoing pleading will be delivered to Chambers within one business day of the electronic filing.

/s/  
Elizabeth A. Mullin  
Attorney for Defendant  
Virginia Bar No. 86668  
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1650 King Street, Suite 500  
Alexandria, VA 22314  
(703)600-0879 (telephone)

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**Victoria Johnson**

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vlynnj911@gmail.com

June 20, 2018

**Honorable Leonie M. Brinkema**

U.S. District Judge

Dear Judge Brinkema,

My name is Victoria Johnson and I am writing this letter to you in reference to my younger brother Sean Duncan. Separated in age by only 4 years, Sean came into my life when I was very young. The day Sean was born, I could not wait for my mother to return home with him from the hospital. I was thrilled to have a baby brother and someone who I could help care for and look after; which is exactly what I have done from birth, until this very day. Although Sean and I come from different fathers, I have never thought of him as being anything less than my brother. In fact, not only is he my brother, but he is my very best friend. I have been blessed to grow up with Sean and go through a majority of my life so far with him by my side. Even though I am the older sibling and have done my best to teach and guide Sean, there are also many things that Sean has taught me. Throughout our childhood, we were moved from school to school, spent most of our time with our grandmother while our parents worked long hours, and things were never very easy. The one thing that always stayed the same though was Sean. No matter where we were, or what we went through, Sean was always a happy go lucky child. He never had an issue making friends, and the kids in the neighborhood would always come looking for him. Things started getting rocky for Sean around 5th grade when his parents were going through a separation and 2 of Sean's best friends had passed away. This was the first time I had ever seen Sean truly upset. The over abundance of sadness and loss lead Sean to lose his desire to go to school, learn, and even make new friends. From that point on, Sean struggled in school and was torn between his mother and father who were fighting for his love. When our mother moved away to Bethany Beach, DE, Sean made the tough decision to stay with his father in Baltimore City. Sean ended up attending a public high school and barely graduated. During this difficult time Sean was befriended by a group of Muslims at his school and made the decision to convert his religion. This then led to Sean meeting and marrying a Muslim woman almost double his age. I truly believe that during this time Sean felt lost and torn between his parents, and was looking for someone to

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comfort him and make him feel loved, despite how he got it. I believe that Sean was happy to feel a sense of security and acceptance, and may have been blind to the situation that he had gotten himself into. Although I do believe that Sean loves his wife, I still feel in my heart that Sean was too young to be married and father a child. At the time, and to this day, Sean is still a kid himself. He never had the opportunity to learn and experience things that teenagers do. Sean has barely held a job, has no college education, and still has so much to learn about life. He let his emotions crowd his mind during a difficult time, and never clearly thought about where he might end up. Despite the series of unfortunate events the past several months, I have been in contact with Sean often, and he continues to remain in good spirits. Sean has expressed to me that there are things he regrets or wishes he could change, but that he has learned from his mistakes and is working on becoming a better person. He has told me about hopes he has for his future, including obtaining a college degree, and being forgiven and loved by anyone he has hurt or let down. As Sean's sister and bestfriend, I know that all of this is sincere, and I know that Sean would never intentionally do anything to upset or hurt anyone. Sean has always been the one to tell me never to judge people without meeting them, and to always forgive because people make mistakes. During the past few months, Sean has also taught me to remain optimistic and to find happiness in any situation. Every time we talk on the phone, or I am able to visit him, Sean finds reasons to laugh and smile, and always makes me do the same. I know that Sean has ended up in a bad situation and may or may not have made some big mistakes, but I also know that this does not define who Sean is as a person. I still believe that he is an amazing human being and I absolutely do not love him any less because of what he has gone through. I can only hope that he is given a real chance to make his mark on the world, like he has on my heart. I love my brother Sean with every ounce of me and I hope that you take his character and difficult road traveled into consideration when deciding his future.

Respectfully,  
Victoria Johnson